

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	: Electronically Filed
IN RE ROYAL BANK OF SCOTLAND	: :
GROUP PLC SECURITIES LITIGATION	: 09 Civ. 300 (DAB)
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	: <b>DECLARATION OF BETH A. KASWAN</b>
	: <b>IN SUPPORT OF IRVING FIREMEN'S</b>
	: <b>MOTION TO INTERVENE AND FOR</b>
	: <b>FURTHER RELIEF</b>
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	: X

I, Beth A. Kaswan, declare as follows:

1. I am a partner with the law firm of Scott+Scott LLP, proposed lead counsel for movant Irving Firemen's Relief and Retirement Fund ("Irving Firemen"). I make this declaration in support of Irving Firemen's Motion to Intervene and for Further Relief, including with respect to its application to be appointed lead plaintiff for claims pled on behalf of a class of purchasers of American Depositary Receipts ("ADR's") for the common shares ("Common ADS") of Royal Bank of Scotland ("RBS"). I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit A: Irving Firemen's proposed Complaint in Intervention;
- Exhibit B: Irving Firemen's Sworn Certification and Loss Chart;
- Exhibit C: The firm résumé of Scott+Scott LLP; and
- Exhibit D: *New York University v. Ariel Fund Limited*, No. 603803/08, Opinion (New York State Supreme Court, New York County, Feb. 22, 2010).

3. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of February 2011, at New York, New York.

*/s/ Beth A. Kaswan*

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BETH A. KASWAN (BK 0264)  
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*Counsel for Irving Firemen's Relief and Retirement  
Fund*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2011 I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 8, 2011.

*/s/ Beth A. Kaswan*

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